

REMARKS

Claims 2-13 are pending in the present application.

Claims 3-10, 12 and 13 are rejected under 35 U.S.C. §103(a) as being unpatentable over Edmond et al. "R-OK: A Reflective Model for Distributed Object Management", 1995 IEEE, (pp. 1-8) ("Edmond") in view of U.S. Patent No. 5,940,487 of Bunch et al. ("Bunch").

Claims 2 and 11 are rejected under 35 U.S.C. §103(a) as being unpatentable over Edmond in view of Bunch as applied to claims 1 and 8 and further in view of U.S. Patent No. 5,155,842 of Rubin ("Rubin").

Claim 13 is rejected under 35 U.S.C. §103(a) as being unpatentable over Edmond in view Bunch. Specifically, the Examiner states that:

As to claim 13, Edmond teaches the invention substantially as claimed including a control framework (*the R-OK model; abstract/ a flexible framework; page.7, right column, fourth paragraph*) for control of services (*for providing structured descriptions and coordinated execution of several reflective distributed computing tasks; page 7, right column, fourth paragraph*), the control framework comprising an application domain level (*domain knowledge ...problem domain; page 1, left column/domain level; page 5, right column, last paragraph*) comprising control logic domain objects (*domain objects; abstract and page. 7, right column, third paragraph*) having object classes (*classes and objects; page. 7, right column, third paragraph*), and a meta level (*the metalevel; abstract*) comprising meta objects (*Metaobjects; abstract/meta-objects; page. 7, right column, third paragraph*) which represent the domain object classes (*used to describe and monitor every domain object in the system: abstract/meta-objects which convey information about or control the implementation and interpretation of their respective domain objects; page 7, right column, third paragraph*).

Edmond does not explicitly use the terms "a telecommunication controller and telecommunication services" and "isolate the domain objects from the services."

Bunch teaches a telecommunications controller and telecommunication services (abstract) and isolate the domain objects from the services (col.5,lines 10-22).

It would have been obvious to a person of ordinary skill in the art at the time the invention was made to combine the teachings of Bunch with Edmond because Bunch's teachings would have provided the capability for managing domain objects and meta objects and generating high performance controller for a wide variety of applications. (7-1-04 Office Action, pp. 2-3)

Applicants respectfully submit that Edmond in view of Bunch does not render Claim 13 unpatentable under 35 U.S.C. §103(a).

Bunch discloses a programmable call processing system and method which provides an interface to allow telecommunications service providers to create their own call processing features on a distributed telecommunications switching system. (Bunch, col. 2, lines 41-46) For example, a telecommunication service provider may wish to implement new call processing features, develop custom features for special end users, collect specific information about a particular call, and collect specific traffic metering and measurement data about certain call processing operations. (Bunch, col. 1, lines 20-25) The invention disclosed by Bunch allows a telecommunication service provider to add extensions to an existing switching system, while generally, the switching system manufacturer and vendor have the expertise to affect the changes desired. (Bunch, col. 1, lines 26-30).

Bunch does not teach or suggest a telecommunication controller, a control framework for control of telecommunication services, or an application domain level comprising control logic domain objects. The invention disclosed by Bunch is a "[p]rogrammable call processing system" that allows a telecommunication service provider to "implement and expand their own call processing features" on a distributed telecommunications switching system. (Bunch, col. 2, lines 41-46.) Bunch calls the service provider's call processing applications call logic programs and shows them in FIG. 3 at 54. (Bunch, col. 4, lines 46-50) The call logic programs 54 are implemented by service providers via a call logic application program interface (API) 56 in FIG. 3. (Bunch, col. 4, lines 49-51) Therefore, Bunch does not teach a telecommunication controller, a control framework or an application domain level comprising control logic domain objects. Bunch teaches a system and method that allows a telephone service

provider to "implement its own customized call logic programs" by using the "programmable call processing system and method" disclosed by Bunch. (Bunch, col. 13, lines 23-27)

Furthermore, Bunch teaches away from implementing the "programmable call processing system and method" in applications that could be implemented by a telecommunication controller, a control framework or an application domain level comprising control logic domain objects. Bunch discloses that the "[p]rogrammable call processing system and method therefor 52 constructed according to the teachings of the present invention are designed primarily to support subscriber features" and furthermore Bunch provides an example of a supported feature, "enhanced translation capability". (Bunch, col. 13, lines 27-31) In contrast to what the invention disclosed by Bunch can implement, Bunch discloses that "[f]or example, the addition of a new signaling protocol to the system cannot be implemented through programmable call processing system 52". (Bunch, col. 34-36) Furthermore, Bunch discloses that "[t]he customer-developed call logic applications are separate processes from the standard switch software processes." (Bunch, col. 37-38) Because the invention of Claim 13 involves telecommunications control, a control framework and an application domain level comprising control logic domain objects, the invention of Claim 13 can be used to implement a new signaling protocol in a telecommunication system and control standard switch software processes.

Specifically, Claim 13 is limited to:

13. A telecommunication controller comprising a control framework for control of telecommunication services, the control framework comprising an application domain level comprising control logic domain objects having object classes, and a meta level comprising meta objects which represent the domain object classes and interface with said telecommunication services to isolate the domain objects from said telecommunication services.

Given that Claims 3-10 and 12 directly or indirectly depend on Claim 13, Applicants submit that Edmund in view of Bunch does not render Claims 3-10 and 12 unpatentable under 35 U.S.C. §103(a).

Furthermore, given that Claims 2 and 11 directly or indirectly depend on Claim 13, Applicants submit that Edmund in view of Bunch and in further view of Rubin does not also render Claims 2 and 11 unpatentable under 35 U.S.C. §103(a).


In view of the arguments set forth herein, it is respectfully submitted that the applicable rejections have been overcome. Accordingly, it is respectfully submitted that Claims 2-13 are in condition for allowance.

If there are any additional charges, please charge them to our Deposit Account Number 500-654.

Respectfully submitted,

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By: \_\_\_\_\_



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